

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 2:17-cv-00442-JRG

LEAD CASE

**FILED UNDER SEAL PURSUANT
TO PROTECTIVE ORDER**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

**SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.**

Defendants.

Civil Action No. 2:17-CV-441-JRG

CONSOLIDATED CASE

**DECLARATION OF MILES D. FREEMAN IN SUPPORT OF DEFENDANT GOOGLE
LLC'S RENEWED MOTION TO TRANSFER TO THE NORTHERN DISTRICT OF
CALIFORNIA**

I, Miles D. Freeman, declare as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google LLC in this matter. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.
2. Attached hereto as Exhibit 1 is a true and correct copy of the document produced by Plaintiff SEVEN Networks, LLC ("SEVEN") bearing the Bates number SEVENLIT0140222.
3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript of the February 21, 2018 Deposition of Ross Bott.

FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

4. Attached hereto as Exhibit 3 is a true and correct copy of a March 13, 2018 Letter from Max Ciccarelli, counsel for SEVEN, to Sean Pak, counsel for Google.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the transcript of the February 22, 2018 Deposition of Keyvan Shahrदार.

6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff SEVEN Networks, LLC's P.R. 3-1 & 3-2 Disclosures to Google.

7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff SEVEN Networks, LLC's Initial Disclosures.

8. Attached hereto as Exhibit 7 is a true and correct copy of a February 13, 2018 Email from Vishal Patel, counsel for SEVEN, to myself, counsel for Google.

9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiff SEVEN Networks, LLC's Notice of Rule 30(b)(6) Deposition of Google LLC on Venue-Related Topics.

10. Attached hereto as Exhibit 9 is a true and correct copy of a February 20, 2018 Email from Lance Yang, counsel for Google, to Matt Cornelia, counsel for SEVEN.

11. Attached hereto as Exhibit 10 is a true and correct copy of the Supplemental Initial Disclosures of Defendant Google LLC, served on March 1, 2018.

12. Attached hereto as Exhibit 11 is a true and correct copy of Defendant Google LLC's Subpoenas to NVIDIA Corporation, dated February 9, 2018.

13. Attached hereto as Exhibit 12 is a true and correct copy of Defendant Google LLC's Subpoenas to VASCO Data Security International, Inc., dated December 22, 2017.

14. Attached hereto as Exhibit 13 is a true and correct copy of a February 23, 2018 Email from Vishal Patel, counsel for SEVEN, to counsel for Google and counsel for Samsung.

FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

15. Attached hereto as Exhibit 14 is a true and correct copy of a February 23, 2018 Email from Matt Cornelia, counsel for SEVEN, to myself, counsel for Google.

16. Attached hereto as Exhibit 15 is a true and correct copy of the webpage http://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile1231.2017.pdf.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed March 13, 2018 in Los Angeles, California.

/s/ Miles D. Freeman
Miles D. Freeman